



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

April 27, 2009

Reply To: ETPA-088

Ref: 08-002-AFS

Clifford J. Dils, Forest Supervisor
Umpqua National Forest
2900 NW Stewart Parkway
Roseburn, OR 97470

Dear Mr. Dils:

The U.S. Environmental Protection Agency (EPA) has reviewed draft Environmental Impact Statement (DEIS) dated March 2009, regarding the **D-Bug Hazard Reduction Timber Sale Project** in the Umpqua National Forest, Douglas County, Oregon. Our review of the DEIS was conducted in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our Section 309 authority, our review of the draft EIS prepared for the proposed project considers the expected environmental impacts, and the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

The DEIS considers three action alternatives to reduce fuels, improve forest conditions, salvage present and future bark beetle mortality, and create fuel breaks around wildland urban interface (WUI) areas near Diamond Lake and Lemolo Lake. The preferred alternative (Alternative 2) would thin 6,557 acres, remove overstory on 59 acres, and salvage 375 acres of dead and dying lodgepole. Alternative 2 would also conduct non-commercial removal of fuels on 2,026 acres. Road activity would include the use of 25.6 miles of existing unclassified roads (11.1 of which would be obliterated after use), and the construction (and subsequent obliteration) of 15.4 miles of new temporary spur roads.

We commend the Forest Service for the careful development of this project, recognizing the many social and ecological values associated with the project area. We also recognize the need to address current stand conditions in order to reduce potential pine beetle infestation and fire hazard within the Diamond and Lemolo Lake WUI. Based on our analysis, we are rating the DEIS LO (Lack of Objections). An explanation of this rating is enclosed.

We offer the following comments and recommendations related to the long term maintenance of Fire Regime Condition Class and climate change analysis as suggestions for inclusion in the Final EIS (FEIS).

Fire Regime Condition Class

As noted on page 105 of the DEIS, the duration of treatment effectiveness would last from 10 to 30 years. We recognize that future harvest over time is outside the scope of the D-Bug project, however we recommend that consideration be given in the DEIS to the kinds of treatments that may be required in the future in order to maintain desired conditions. Without periodic treatment the project's medium and long term fire risk gains may be limited.¹

Recommendation:

- Include a discussion of future treatment requirements in order to maintain desired conditions. This should include an examination of long term access needs.

Climate Change Mitigation and Adaptation

We appreciate the discussion in the DEIS on the project's expected contributions to carbon dioxide emissions (DEIS, p. 187). We encourage the Forest to expand on this discussion to consider climate change's expected impact on the project area. This includes wildfire patterns and frequency, altered water quantity and quality (e.g. temperature); timing of flow; spatial and temporal shifts of vegetative communities and wildlife habitat; potential increases for invasive species resistance to mitigation measures;² and increased opportunities for warm weather recreation.

To adapt to the above and other climate change impacts - as well as to mitigate climate change - EPA supports the recommendations and cited resources of the January 13, 2009 Forest Service initial guidance document, "Climate Change Considerations in Project Level NEPA Analysis".

Recommendations:

- We recommend that the FEIS discuss effects of climate change on the project and the effects of the project on climate change. For the effects discussion of climate change on the project area we are especially interested in how the project's protection of connectivity, resilience and biodiversity anticipates likely climate change impacts.³
- In light of the CO₂ emissions that would be generated by pile burning and underburning, we also recommend the FEIS identify the market conditions that would make biomass utilization feasible, and we encourage the Forest Service to aggressively pursue this option.

¹ See, for instance, Mason et al., 2003. Investigation of Alternative Strategies for Design, Layout and Administration of Fuel Removal Projects. http://www.ruraltech.org/pubs/reports/fuel_removal/

² http://www.ars.usda.gov/research/publications/Publications.htm?seq_no_115=134271

³ See, for example, "SAP 4.4. Adaptation Options for Climate-Sensitive Ecosystems and Resources | National Forests" at <http://www.climate-science.gov/Library/sap/sap4-4/final-report/sap4-4-final-report-Ch3-Forests.pdf> for additional information.

- Finally, we recommend that the FEIS and/or ROD include some indication of how climate change considerations (if any) have been weighed during decision making.

Thank you for this opportunity to comment on the DEIS. If you have any questions please contact Teresa Kubo or my staff at (503) 326-2859.

Sincerely,

/s/

Christine B. Reichgott, Manager
Environmental Review and
Sediment Management Unit

Enclosures:
EPA Rating System for Draft EISs